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5 Counsel for FRED HJELMESET,
6 Trustee in Bankruptcy

7
8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 In re

12 EVANDER FRANK KANE,
13 Debtor.

Case No. 21-50028 SLJ
Chapter 7
Hon. Stephen L. Johnson

**THIRD STIPULATION TO ENTRY OF
ORDER EXTENDING DATE FOR FILING
COMPLAINT
(11 U.S.C. SECTION 727)**

[No Hearing Requested]

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18 This third stipulation is entered into by and between Evander Frank Kane (“Debtor”) and
19 Fred Hjelmset, Trustee in Bankruptcy of the Debtor’s estate (“Trustee”), through their respective
20 counsel.

21 **RECITALS**

- 22 A. On January 9, 2021, the Debtor filed a Voluntary Chapter 7 Petition.
23 B. On January 11, 2021, the Bankruptcy Court issued its “Notice of Chapter 7
24 Bankruptcy Case,” Docket 4 (“Notice”).
25 C. The Notice provided that the deadline for filing complaints against the Debtor for
26 non-dischargeability or denial of discharge was April 5, 2021.

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1 D. On March 22, 2021, the Trustee caused to be filed the Stipulation to Entry of Order
2 Extending Date for Filing Complaint (11 U.S.C. Section 727) as Docket 68, which stipulation was
3 approved by the Order Extending Date for Filing Complaint Objecting to Discharge (11 U.S.C.
4 Section 727) entered March 22, 2021 as Docket 70, which order extended the deadline established
5 by Rule 4004 of the Federal Rules of Bankruptcy Procedure to object to the Debtor's discharge
6 through and including May 5, 2021.

7 E. On April 22, 2021, the Trustee caused to be filed the Second Stipulation to Entry of
8 Order Extending Date for Filing Complaint (11 U.S.C. Section 727) as Docket 104, which
9 stipulation was approved by the Order Extending Date for Filing Complaint Objecting to Discharge
10 (11 U.S.C. Section 727) entered April 23, 2021 as Docket 105 (the "Order"). The Order extended
11 the deadline established by Rule 4004 of the Federal Rules of Bankruptcy Procedure to object to the
12 Debtor's discharge through and including June 11, 2021.

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14 **STIPULATION**

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16 NOW, THEREFORE, the parties agree as follows:

17 1. With regard to any complaints that would have to be filed by the Trustee in
18 conformity with Bankruptcy Code Section 727 (11 U.S.C. § 727) and Rule 4004 of the Federal
19 Rules of Bankruptcy Procedure (i.e., discharge of debt) shall be extended for approximately 69 days
20 from the current deadline of June 11, 2021 through and including August 19, 2021.

21 2. The parties further agree that the new deadline, August 19, 2021, may be further
22 extended by stipulation of the parties.

23 3. The parties agree to entry of an order in the form annexed hereto as **Exhibit A**.

24
25 DATED: May 27, 2021

RINCON LAW LLP

26
27 By: /s/ Gregg S. Kleiner

GREGG S. KLEINER

28 Counsel for FRED HJELMESET,
Trustee in Bankruptcy

1 DATED: May 27, 2021

FINESTONE HAYES LLP

2
3 By: *Stephen D. Finestone*

4 STEPHEN D. FINESTONE
5 Counsel for Debtor,
6 EVANDER FRANK KANE
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12 NORTHERN DISTRICT OF CALIFORNIA
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14 In re

15 EVANDER FRANK KANE,
16 Debtor.

Case No. 21-50028 SLJ
Chapter 7
Hon. Stephen L. Johnson

**THIRD ORDER EXTENDING DATE FOR
FILING COMPLAINT OBJECTING TO
DISCHARGE
(11 U.S.C. SECTION 727)**

17 Based on the Third Stipulation to Entry of Order Extending Date for Filing Complaint (11
18 U.S.C. Section 727) (the "Stipulation") entered into by and between Fred Hjelmset, Trustee in
19 Bankruptcy of the Debtor's estate and Debtor Evander Frank Kane, through their respective counsel,
20 electronically filed on May 28, 2021, as Docket No. _____,

21 IT IS HEREBY ORDERED, as follows:

- 22 1. The Stipulation is approved.
- 23 2. With regard to the Trustee, the current deadline established by Rule 4004 of the
24 Federal Rules of Bankruptcy Procedure to object to the Debtor's discharge is hereby extended
25 through and including August 19, 2021.

26 *** **END OF ORDER** ***
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EXHIBIT A

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*** *COURT SERVICE LIST* ***

No Court service required.